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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Edward S. Kiel  
 :  
 ALBERTO CODO : Mag. No. 21-15471  
 :

I, Special Agent Robert DiRocco, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigations, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**



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Robert DiRocco, Special Agent  
Federal Bureau of Investigations

Agent Robert DiRocco attested to this Affidavit  
by telephone pursuant to FRCP 4.1(b)(2)(A),  
on November 4, 2021, in the District of New Jersey

Honorable Edward S. Kiel  
HONORABLE EDWARD S. KIEL  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**  
**(Murder-for-Hire)**

From at least in or around May 2021 through in or around November 2021, in the District of New Jersey and elsewhere, the defendant,

**ALBERTO CODO,**

Conspired to travel in and traveled in interstate commerce from the State of New Jersey to the State of Texas, and did knowingly and intentionally conspire to and use, and cause another to use, a facility of interstate commerce, that is, a telephone, with intent that a murder be committed, in violation of the laws of the State of New Jersey, that is, New Jersey Statutes Annotated, Section 2C:11-3, as consideration for a promise and agreement to pay something of pecuniary value, that is, United States currency.

In violation of Title 18, United States Code, Sections 1958 and 2.

**ATTACHMENT B**

I, Robert DiRocco, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged. Where statements of others are related herein, they are related in substance and part.

1. Law enforcement has been conducting an investigation into the defendant, Alberto Codo ("CODO"). In or around May 2021, CODO communicated with another individual ("Individual-2") who wanted CODO to kill or locate someone to kill a minor female ("Victim"). Upon information and belief, CODO and Individual-2 met at a location in the vicinity of Plainfield, New Jersey, in the District of New Jersey, on or about May 27, 2021. Individual-2 provided CODO with an address in San Antonio, Texas, later determined to be Victim's address ("Victim's Residence"), and a name, later determined to be the name of Victim's father. Individual-2 also showed CODO a photograph of a minor female, alleged to be Victim.

2. During this meeting, Individual-2 provided CODO with a quantity of U.S. currency as payment for killing Victim and/or having Victim killed.

3. Shortly thereafter, in or around early June 2021, CODO traveled from the State of New Jersey to the State of Texas for the purposes of conducting reconnaissance at the Victim's Residence. While there, CODO took photographs of the Victim's Residence and vehicles, as well as the surrounding area.

4. Law enforcement has conducted a lawful search of a cellular telephone device belonging to CODO ("Cellular Device-1") and observed photographs believed to have been taken in or around early June 2021 in the vicinity of the Victim's Residence. For example, one photograph located in Cellular Device-1 depicts what appears to be a street sign with the street name of the Victim's Residence. Additionally, based upon location data obtained from Cellular Device-1, law enforcement has confirmed that CODO traveled from the State of New Jersey to the State of Texas around this time.

5. At some point, upon CODO's return from Texas, Individual-2 instructed CODO to proceed with the scheme to murder Victim. Individual-2 also advised CODO that the Victim must be killed before the end of October 2021.

**Meeting Between CODO and Individual-2**

6. On or about November 1, 2021, CODO met with Individual-2 at a location in the vicinity of Plainfield, New Jersey, in the District of New Jersey. Prior to this meeting, CODO was equipped with an audio and/or video recording device.<sup>1</sup>

7. During the meeting, CODO stated in sum and substance that he had “another guy, he charges 10 or 15, and takes care of it.” Based upon the investigation to date, I understand CODO to be referring to a purported hitman. Individual-2 inquired “What does he want” to which CODO responded that the purported hitman “wants to know how the job is to be done” and if “there is anyone else home.” Individual-2 confirmed the “mom and dad” prompting CODO to inquire, “Am I going to eliminate all of them?” Individual-2 responded in sum and substance, “Of course, what’s the problem?”

8. Individual-2 acknowledged that the “target” is a 13-year-old female. Individual-2 informed CODO in sum and substance, “the other guy doesn’t want to see you. I paid for a job that needs to be done, I paid you not anyone else.” CODO inquired as to the timing, and Individual-2 responded, “Today is the last day . . . he gave you a month, to the end of this month.” Individual-2 further acknowledged that he was aware “that the first time you [CODO] went there by yourself.” I understand Individual-2 to be referring to CODO’s trip to Texas in or around June 2021.

9. Individual-2 expressed in sum and substance, “to me, you wasted all of the money and you got involved with the wrong people . . . you wasted the money and didn’t kill anyone.” I understand Individual-2 to be referring to the quantity of U.S. currency paid to CODO in or around May 2021 in furtherance of the scheme.

10. Additionally, Individual-2 stated in sum and substance that “he [the purported assassin] needs to do something, [he] doesn’t have to kill everyone—he can leave one hurt badly, mutilate another, the dad fucked—you understand or not?” Individual-2 explained, “as long as the girl is eliminated the rest does not matter.”

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<sup>1</sup> The original communication occurred in Portuguese and has been preliminarily translated for purposes of this Complaint.